

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

ALAMEDA RESEARCH LLC, ALAMEDA
RESEARCH LTD., FTX TRADING LTD.,
WEST REALM SHIRES, INC., and WEST
REALM SHIRES SERVICES, INC.,

Plaintiffs,

-against-

FTX DIGITAL MARKETS LTD., BRIAN C.
SIMMS, KEVIN G. CAMBRIDGE, and
PETER GREAVES, and J. DOES 1–20

Defendants.

Adv. Pro. No. 23-50145 (JTD)

Re: Adv. Docket No. 6

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On March 19, 2023, Alameda Research LLC, Alameda Research Ltd., FTX Trading Ltd., West Realm Shires, Inc., and West Realm Shires Services, Inc. (collectively, the

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

“Plaintiffs”) commenced the above-captioned adversary proceeding (the “Adversary Proceeding”), pending in the United States Bankruptcy Court for the District of Delaware (the “Court”) by filing the *Complaint* [Adv. Docket No. 1] (the “Complaint”) against FTX Digital Markets, Ltd. (“Digital”), Brian C. Simms KC, Kevin G. Cambridge and Peter Greaves, the Joint Provisional Liquidators and Foreign Representatives of FTX DM (the “JPLs” and, together with Digital, the “JPL Defendants,” and together with the Plaintiffs, the “Parties”).

2. On April 21, 2023, the Parties entered into that certain *Stipulation Between the Parties to Extend the JPL Defendants’ Deadline to Answer or Otherwise Respond to the Complaint* [Adv. Docket No. 4], which extended the JPL Defendants’ deadline to answer or otherwise respond to the Complaint to May 8, 2023.

3. On May 8, 2023, the JPL Defendants filed the *Motion of FTX Digital Markets Ltd. and the Joint Provisional Liquidators to Dismiss the Complaint or, in the Alternative, to Abstain from Ruling on Counts I-IV* [Adv. Docket No. 6] (the “Motion to Dismiss”).

4. The Parties have conferred and agree that the Plaintiffs shall have through and including June 14, 2023 to file a response to the Motion to Dismiss. The JPL Defendants shall have through and including July 10, 2023 to file any reply in support of the Motion to Dismiss.

5. The Parties’ stipulation is attached as **Exhibit A** to the proposed form of order approving the stipulation, which is annexed hereto as **Exhibit 1** (the “Order”).

6. Accordingly, the Parties respectfully request that the Bankruptcy Court enter the Order at its earliest convenience.

Dated: May 22, 2023
Wilmington, Delaware

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